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December 11, 2014

Mark R. Riley  
Riley Recycling Inc  
2817 Main Street  
Chula Vista, CA 91911

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Paul H. Sweeney, Sr.  
2471 Calle de Pescadores  
Alpine, CA 91901

Re: Notice of Violation and Intent to File Clean Water Act Citizens' Suit  
[33 U.S.C. § 1365] 60-Day Notice

Dear Mr. Riley and Mr. Sweeney,

Please accept this letter on behalf of Coastal Environmental Rights Foundation ("CERF") regarding violations of the Federal Water Pollution Control Act (Clean Water Act) occurring at the Riley Recycling facility located at 15 28<sup>th</sup> Street, San Diego, CA (WDID No. 9371022805). This letter constitutes CERF's notice of intent to sue for violations of the Clean Water Act and National Pollution Discharge Elimination System (NPDES) Permit No. CAS000001 (General Industrial Permit), as more fully set forth below.

Section 505(b) of the Clean Water Act requires that sixty (60) days prior to the initiation of a citizen's civil lawsuit in Federal District Court under section 505(a) of the Act, a citizen must give notice of the violations and the intent to sue to the violator and various agency officials. (33 U.S.C. § 1365(b)(1)(A)). In compliance with section 1365, this letter provides notice of Riley Recycling's violations and of CERF's intent to sue.

I. **BACKGROUND**

A. **Riley Recycling Facilities**

Riley Recycling Inc (formerly Riley Recycling LLC) operates a scrap recycling facility at 15 28<sup>th</sup> Street in San Diego, California ("Facility" or "Riley"). The Facility has been enrolled under the General Industrial Permit since August 2010. Riley operates adjacent to Active Auto Dismantlers ("Active Auto"). Upon information available to CERF, the owners and operators of Active Auto own the property at which Riley operates. The owners of the property located at 15 28<sup>th</sup> Street and the owners/operators of Riley are collectively referred to as the "Riley Owners and/or Operators."

On or about October 2, 2014, CERF sent a 60-Day Notice Letter to Mr. Sweeney for Active Auto's various Clean Water Act violations. On or about December 9, 2014, CERF representatives conducted an inspection of the Active Auto site, as well as the Riley site, with Mr. and Mrs. Sweeney. During the site visit, numerous violations were noted and explained to both Mr. and Mrs. Sweeney, as well as Riley staff. This letter is a follow up to that visit, as well

as subsequent review of the Riley Annual Reports.

#### **B. Storm Water Pollution From Industrial Facilities**

Storm water pollution results from materials and chemicals washed into the storm drains from streets, gutters, neighborhoods, industrial sites, parking lots and construction sites. This type of pollution is significant because storm water is often untreated and flows directly to receiving waters, including lakes, rivers, or ultimately the ocean. Storm water runoff associated with industrial facilities in particular has the potential to negatively impact receiving waters and contributes to the impairment of downstream waterbodies. Industrial areas are known to result in excessive wet-weather storm water discharges, as well as contaminated dry weather entries into the storm drain system.<sup>1</sup> "The bulk size of the recyclable waste materials and the processing equipment associated with these facilities frequently necessitates stockpiling materials and equipment outdoors. Consequently, there is significant opportunity for exposure of storm water runoff to pollutants." (Fed.Reg. Vol. 60, No. 189, p. 50953). Potential pollutants exposed to storm water at scrap and waste recycling facilities include, but are not limited to: oil and grease; metals including magnesium, aluminum, cadmium, zinc, steel or iron, cast iron, chromium, tin, lead, nickel, soft and silver solder, copper, stainless steel, silver, gold, platinum, brass and bronze; lead acid; hydraulic fluids and other lubricants. (*Id.* at pp. 50953-50956).

#### **C. San Diego Bay and Pacific Ocean**

Discharges from the Facility flow downstream into San Diego Bay and ultimately the Pacific Ocean. San Diego Bay is on the 303(d) list as impaired for numerous constituents, including metals such as copper and zinc. Therefore, discharges from the Facility contributes to the impairment of San Diego Bay and exacerbates such impairment.

#### **D. Discharges From Riley Recycling**

Riley has been enrolled under the General Industrial Permit since August 2010. Runoff appears to flow to the southwest corner of the property. An oil and water separator is located at this corner.

#### **E. Coastal Environmental Rights Foundation**

CERF is a California nonprofit public benefit corporation founded by surfers dedicated to the protection, preservation and enhancement of the environment, wildlife, natural resources, local marine waters and other coastal natural resources. CERF's interest are and will be adversely affected by Riley Owners and/or Operators' actions. CERF's mailing address is 1140 S. Coast Highway 101, Encinitas, CA 92024. Its telephone number is (760) 942-8505.

Members of CERF use and enjoy the waters into which pollutants from Riley's ongoing illegal activities are discharged, including San Diego Bay and the Pacific Ocean. The public and members of CERF use these receiving waters to fish, sail, boat, kayak, surf,

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<sup>1</sup> *Illicit Discharge Detection and Elimination: Technical Appendices, Appendix K, Specific Considerations for Industrial Sources of Inappropriate Pollutant Entries to the Storm Drainage System* (Adapted from Pitt, 2001)



swim, scuba dive, birdwatch, view wildlife, and to engage in scientific studies. The discharge of pollutants by Riley affects and impairs each of these uses. Thus, the interests of CERF's members have been, are being, and will continue to be adversely affected by the Riley Owners and/or Operators' failure to comply with the Clean Water Act and the General Industrial Permit.

## **II. CLEAN WATER ACT VIOLATIONS**

The Clean Water Act (CWA) was amended in 1972 to provide that the discharge of pollutants to waters of the United States from any point source is effectively prohibited unless the discharge is in compliance with an NPDES permit. The 1987 amendments to the CWA added Section 402(p) that establishes a framework for regulating municipal and industrial storm water discharges under the NPDES Program. In 1990, US EPA published final regulations that require storm water associated with industrial activity that discharges either directly to surface waters or indirectly through municipal separate storm sewers be regulated by an NPDES permit. Any person who discharges storm water associated with industrial activities must comply with the terms of the General Industrial Permit in order to lawfully discharge pollutants. (33 U.S.C. §§1311(a), 1342; 40 CFR §126(c)(1); General Industrial Permit Fact Sheet, p. vii ["All facility operators filing an NOI after the adoption of this General Permit must comply with this General Permit."]).

As enrollees under the General Industrial Permit, Riley's Owners and/or Operators have failed and continue to fail to comply with the General Industrial Permit, as detailed below. Failure to comply with the General Industrial Permit is a Clean Water Act violation. (General Industrial Permit, §C.1).

### **A. Riley Discharged Contaminated Storm Water in Violation of the General Industrial Permit**

Discharge Prohibition A(2) of the General Industrial Permit prohibits storm water discharges and authorized non-storm water discharges which cause or threaten to cause pollution, contamination, or nuisance. Receiving Water Limitation C(1) of the Storm Water Permit prohibits storm water discharges to surface or groundwater that adversely impact human health or the environment. In addition, receiving Water Limitation C(2) prohibits storm water discharges and authorized non-storm water discharges, which cause or contribute to an exceedance of any water quality standards, such as the CTR or applicable Basin Plan water quality standards. "The California Toxics Rule ("CTR"), 40 C.F.R. 131.38, is an applicable water quality standard." (*Baykeeper v. Kramer Metals, Inc.* (C.D.Cal. 2009) 619 F.Supp.2d 914, 926). "In sum, the CTR is a water quality standard in the General Permit, Receiving Water Limitation C(2). A permittee violates Receiving Water Limitation C(2) when it 'causes or contributes to an exceedance of such a standard, including the CTR.'" (*Id.* at 927).

If a discharger violates Water Quality Standards, the General Industrial Permit and the Clean Water Act require that the discharger implement more stringent controls necessary to meet such Water Quality Standards.(General Industrial Permit, Fact Sheet p. viii; 33 U.S.C. § 1311(b)(1)(C)). The Riley Owners and/or Operators have failed to comply with this requirement, violating Water Quality Standards without implementing BMPs to achieve BAT/BCT or revising their SWPPP pursuant to section (C)(3).

As demonstrated by sample data submitted by Riley, from at least February 26, 2011 through the present, Riley Owners and/or Operators have discharged and continue to discharge storm water containing pollutants at levels in violation of the above listed prohibitions and limitations. Riley's own sampling data is not subject to impeachment. (*Baykeeper, supra*, 619 F.Supp. 2d at 927, citing *Sierra Club v. Union Oil Co. of Cal.*, (9th Cir. 1987) 813 F.2d 1480, 1492 ["when a permittee's reports indicate that the permittee has exceeded permit limitations, the permittee may not impeach its own reports by showing sampling error"]).

This data further demonstrates the Riley Facility continuously discharges contaminated storm water during rain events which have not been sampled. (See Exhibit B, Rainfall data).

Annual Sampling Data			Applicable CTR Limit (mg/L)	
Date/time of sample collection	Parameter	Result (mg/L)	Maximum Conc.	Continuous Conc.
2/26/2011	Copper Total	.082	0.013	0.009
2/26/2011	Lead Total	.143	0.013	0.009
2/26/2011	Zinc Total	0.578	0.12	0.12

Every day the Riley Owners and/or Operators discharged or continue to discharge polluted storm water in violation of the Discharge Prohibitions and Receiving Water Limitations of the General Industrial Permit is a separate and distinct violation of the Permit and Section 301(a) of the Clean Water Act, 33 U.S.C. §1311(a). The Riley Owners and/or Operators are subject to civil penalties for all violations of the Clean Water Act occurring since February 26, 2011. These violations are ongoing and the Riley Owners and/or Operators' violations will continue each day contaminated storm water is discharged in violation of the requirements of the General Industrial Permit. (See Exhibit B, Rainfall data). CERF will include additional violations when information becomes available.

**B. Failure to Develop and/or Implement BMPs that Achieve Compliance with Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology**

Effluent Limitation (B)(3) of the Storm Water Permit requires dischargers to reduce or prevent pollutants associated with industrial activity in storm water discharges and authorized non-storm water discharges through implementation of the Best Available Technology Economically Achievable (BAT) for toxic pollutants<sup>2</sup> and Best Conventional Pollutant Control Technology (BCT) for conventional pollutants.<sup>3</sup>

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<sup>2</sup> Toxic pollutants are found at 40 CFR § 401.15 and include, but are not limited to: lead, nickel, zinc, silver, selenium, copper, and chromium.

<sup>3</sup> Conventional pollutants are listed at 40 CFR § 401.16 and include biological oxygen demand, total suspended solids, pH, fecal coliform, and oil and grease.

EPA Benchmarks are the pollutant concentrations which indicate whether a facility has successfully developed or implemented BMPs that meet the BAT/BCT. For scrap metal yards (SIC 5093), the EPA has instituted the following benchmarks<sup>4</sup>:

Parameter	Benchmark Monitoring Cutoff Concentration (mg/L)
Total Suspended Solids (TSS)	100
Total Recoverable Aluminum	.75
Total Recoverable Copper (hardness dependent)	.0038-.0332 .0156 at 100-125 mg/L hardness
Total Recoverable Iron	1.0
Total Recoverable Lead (hardness dependent)	.014-.262 .095 at 100-125 mg/L hardness
Total Recoverable Zinc (hardness dependent)	.04-.26 .13 at 100-125 mg/L hardness

Discharges with pollutant concentration levels above EPA Benchmarks and/or the CTR demonstrate that a facility has failed to develop and/or implement BMPs that achieve compliance with BAT for toxic pollutants and BCT for conventional pollutants. The Riley 2010-2011 Annual Report demonstrates exceedances of not only the CTR, but also EPA benchmarks.

Annual Sampling Data 636 Front Street Location			
Date/time of sample collection	Parameter	Result (mg/L)	EPA Benchmark (mg/L)
2/26/2011	Aluminum	6.73	.75
2/26/2011	Copper	.082	.0156
2/26/2011	Iron	13.1	1.0
2/26/2011	Lead	.143	.095
2/26/2011	Zinc	.578	.13

Thus, the Riley Owners and/or Operators' storm water discharge sampling data demonstrates the Riley Owners and/or Operators have not developed and/or implemented BMPs that meet the standards of BAT/BCT. (See *Baykeeper, supra*, 619 F.Supp. 2d at 925 ["Repeated and/or significant exceedances of the Benchmark limitations should be relevant" to

<sup>4</sup> 2008 Storm Water Multi-Sector General Permit for Industrial Activities, Sector N, Table 8.N -1



the determination of meeting BAT/BCT)). Observations and photographs of the Riley Facility confirm these violations. (See Exhibit A, Photos). Site visit photographs show a lack of adequate BMPs at the Facility including large piles of scrap with no covering or containment. (See Exhibit A). These large piles consist of metals, shavings, scrap parts, and other appliances. Indeed, during a January 2014 site visit, the Regional Board and State Water Board staff found numerous violations, including deficient BMPs. (See Exhibit A).

In addition, the Facility is paved and littered with debris and stained from storm water pollutants, including oil. The dirt, debris, sediment and pollutants at this Facility are picked up during rain events and carried into the storm drains, eventually making their way to downstream receiving waters.

Sources of pollutants at the Riley Facility are numerous, including but not limited to: scrap metal ferrous and non-ferrous outdoor storage areas; scrap metal, miscellaneous machinery, obsolete equipment, and used appliances, piles of turnings and cuttings; and onsite material handling equipment and forklifts. Pollutants associated with the Riley Facility include but are not limited to: toxic metals such as copper, iron, zinc, lead, cadmium and aluminum; petroleum products including oil, fuel, grease, transmission fluids, brake fluids, hydraulic oil and diesel fuel; chemical admixtures, battery fluids, refrigerator and other appliance fluids, acids and solvents; total suspended solids and pH-affecting substances; and fugitive and other dust, dirt and debris.

At the Riley Facility, virtually no BMPs are in place to prevent storm water and non-storm water from contacting the aforementioned pollutant sources. Although a concrete "wall" has been erected (ostensibly to prevent migration of scrap piles) and berms have been placed to convey storm water to a separator, the berms are ineffective and likely convey water around the treatment device, while the concrete blocks do not prevent polluted water from leaving the site. In addition, the straw waddle at the perimeter of the treatment device appears saturated with oil and contaminants and has deteriorated to a state of likely being a source of contaminants rather than a BMP.

Thus, the Riley Owners and/or Operators are seriously in violation of Effluent Limitation (B)(3) of the Storm Water Permit. Every day the Riley Owners and/or Operators operate with inadequately developed and/or implemented BMPs in violation of the BAT/BCT requirements in the General Industrial Permit is a separate and distinct violation of the Storm Water Permit and Section 301(a) of the Clean Water Act. (33 U.S.C. § 1311 (a)). The Riley Owners and/or Operators have been in daily and continuous violation of the BAT/BCT requirements of the General Industrial Permit every day since at least August 2010. These violations are ongoing and the Riley Owners and/or Operators will continue to be in violation every day they fail to develop and/or implement BMPs that achieve BAT/BCT to prevent or reduce pollutants associated with industrial activity in storm water discharges at the Riley Facility. The Riley Owners and/or Operators are subject to penalties for all violations of the General Industrial Permit and the Clean Water Act occurring since at least August 2010. Thus, the Riley Facility Owners and/or Operators are liable for civil penalties for 1561 violations of the General Industrial Permit and the Clean Water Act.

**C. Failure to Develop and/or Implement an Adequate Storm Water Pollution Prevention Plan**

Section A(1) and Provision E(2) of the General Industrial Permit require dischargers to have developed and implemented a SWPPP by October 1, 1992, or prior to beginning industrial activities, that meets all of the requirements of the Storm Water Permit. The objective behind the SWPPP requirements is to identify and evaluate sources of pollutants associated with industrial activities that may affect the quality of storm water discharges from the Riley Facility, and implement site-specific BMPs to reduce or prevent pollutants associated with industrial activities in storm water discharges. (General Industrial Permit, Section A(2)). To ensure its effectiveness, the SWPPP must be evaluated on an annual basis pursuant to the requirements of Section A(9), and must be revised as necessary to ensure compliance with the Permit. (General Industrial Permit, Section A(9), (10)).

In addition, section A(3) - A(10) of the General Industrial Permit sets forth the requirements for a SWPPP, including but not limited to: a site map showing the facility boundaries, storm water drainage areas with flow patterns, nearby water bodies, the location of the storm water collection, conveyance and discharge system, structural control measures, areas of actual and potential pollutant contact, and areas of industrial activity (Section A(4)); a list of significant materials handled and stored at the site (Section A(5)); and, a description of potential pollutant sources including industrial processes, material handling and storage areas, dust and particulate generating activities, a description of significant spills and leaks, a list of all non-storm water discharges and their sources and a description of locations where soil erosion may occur (Section A(6)). Sections A(7) and (8) require an assessment of potential pollutant sources at the facility and a description of the BMPs to be implemented at the facility that will reduce or prevent pollutants in storm water discharges and authorized non-storm water discharges, including structural BMPs where non-structural BMPs are not effective.

CERF investigators' observations of the conditions at the Riley Facility and sampling data from storm water discharges from the Riley Facility, which are set forth in detail above, indicate the Riley Owners and/or Operators have not developed or implemented an adequate SWPPP that meets the requirements of Section A of the General Industrial Permit. Indeed, historical aerial photographs and more recent street-level photographs show a variety of materials, including scrap metal and electronics, stored without cover or containment. (See Exhibit A, Photos).

Every day the Riley Owners and/or Operators operate the Riley Facility without an adequately developed and/or implemented SWPPP is a separate and distinct violation of the General Industrial Permit and Section 301(a) of the Clean Water Act. (33 U.S.C. § 1311(a)). The Riley Facility Owners and/or Operators have been in daily and continuous violation of the General Industrial Permit's SWPPP requirements every day since at least August 2010. These violations are ongoing and the Riley Facility Owners and/or Operators will continue to be in violation every day they fail to revise, develop, and/or implement an adequate SWPPP for the Facility.

The Riley Owners and/or Operators are thus subject to penalties for all SWPPP-related violations of the General Industrial Permit and the Clean Water Act occurring since at least August 2010. The Riley Owners and/or Operators are liable for civil penalties for 1561 violations of the General Industrial Permit and the Act.



**D. Failure to Monitor**

The Riley Owners and/or Operators have further failed to sample two storm events as required since enrollment under the General Industrial Permit. Indeed, Riley Owners and/or Operators have only sampled once since enrollment. Sections B(5) and (7) of the General Industrial Permit require dischargers to visually observe and collect samples of storm water discharged from all locations where storm water is discharged. Facility operators, including the Riley Owners and/or Operators, are required to collect samples from at least two qualifying storm events each wet season, including one set of samples during the first storm event of the wet season. Required samples must be collected by Facility operators from all discharge points and during the first hour of the storm water discharge from the Facility.

The Riley Owners and/or Operators have not only failed to obtain two samples as required, despite qualifying rain events during business hours (See Exhibit B, rainfall data), but also failed to monitor all of the required constituents the one time monitoring was conducted. In connection with the February 26, 2014 sampling event, the Riley Owners and/or Operators failed to monitor pH and TSS as required. The Riley Owners and/or Operators are thus subject to penalties in accordance with the General Industrial Permit – punishable by a minimum of \$37,500 per day of violation. (33 U.S.C. §1319(d); 40 CFR 19.4).

**III. Remedies**

Upon expiration of the 60-day period, CERF will file a citizen suit under Section 505(a) of the Clean Water Act for the above-referenced violations. During the 60-day notice period, however, CERF is willing to discuss effective remedies for the violation noted in this letter. If you wish to pursue such discussions in the absence of litigation, it is suggested that you initiate those discussions immediately. If good faith negotiations are not being made, at the close of the 60-day notice period, CERF will move forward expeditiously with litigation.

CERF's action will seek all remedies available under the Clean Water Act § 1365(a)(d). CERF will seek to enjoin the illegal discharges from the Fabrication Technologies Industries facility. CERF will also seek the maximum penalty available under the law which is \$37,500 per day.

CERF may further seek a court order to prevent Riley from discharging pollutants. A strong or substantial likelihood of success on the merits of CERF's claim exists, and irreparable injuries to the public, public trust resources, and the environments will result if Riley further discharges pollutants into the San Diego Bay and Pacific Ocean.

Lastly, section 505(d) of the Clean Water Act, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorneys' and experts' fees. CERF will seek to recover all of its costs and fees pursuant to section 505(d).



**IV. Conclusion**

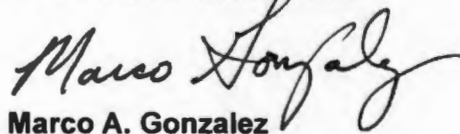
CERF has retained legal counsel to represent it in this matter. Please direct all communications to Coast Law Group:

**Marco A. Gonzalez**  
**COAST LAW GROUP LLP**  
**1140 S. Coast Highway 101**  
**Encinitas, CA 92024**  
**Tel: (760) 942-8505 x 102**  
**Fax: (760) 942-8515**  
**Email: marco@coastlawgroup.com**

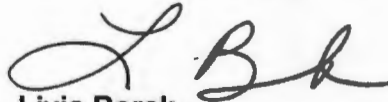
CERF will entertain settlement discussions during the 60-day notice period. Should you wish to pursue settlement, please contact Coast Law Group LLP at your earliest convenience.

Sincerely,

**COAST LAW GROUP LLP**



**Marco A. Gonzalez**



**Livia Borak**  
Attorneys for  
Coastal Environmental Rights Foundation

CC:

<b>Jared Blumenfeld, Region 9 Administrator</b> <b>Alexis Strauss, Deputy Regional Administrator</b> <b>U.S. EPA, Region 9</b> <b>75 Hawthorne Street</b> <b>San Francisco, CA, 94105</b>	<b>Dave Gibson, Executive Officer</b> <b>Catherine Hagan, Staff Counsel</b> <b>San Diego Regional Water Quality Control Board</b> <b>2375 Northside Drive, Suite 100</b> <b>San Diego, CA 92108-2700</b>
<b>Gina McCarthy</b> <b>EPA Administrator</b> <b>Mail Code 4101M</b> <b>US EPA Ariel Rios Building (AR)</b> <b>1200 Pennsylvania Avenue N.W.</b> <b>Washington, DC 20004</b>	<b>Thomas Howard</b> <b>Executive Director</b> <b>State Water Resources Control Board</b> <b>P.O. Box 100</b> <b>Sacramento, CA 95812-0110</b>

**Index of Attachments**

Exhibit A: Photos—December 9, 2014 Site Visit and  
January 2014 Regional Board/State Board site visit  
Aerial and Street view historic photographs

Exhibit B: Rainfall Data

Exhibit C: Sector N Fact Sheet



**EXHIBIT A**





















Google Image Aerial View



Street View Google Maps (July 2011)



Historical Street View Google Maps (Jan 2011)

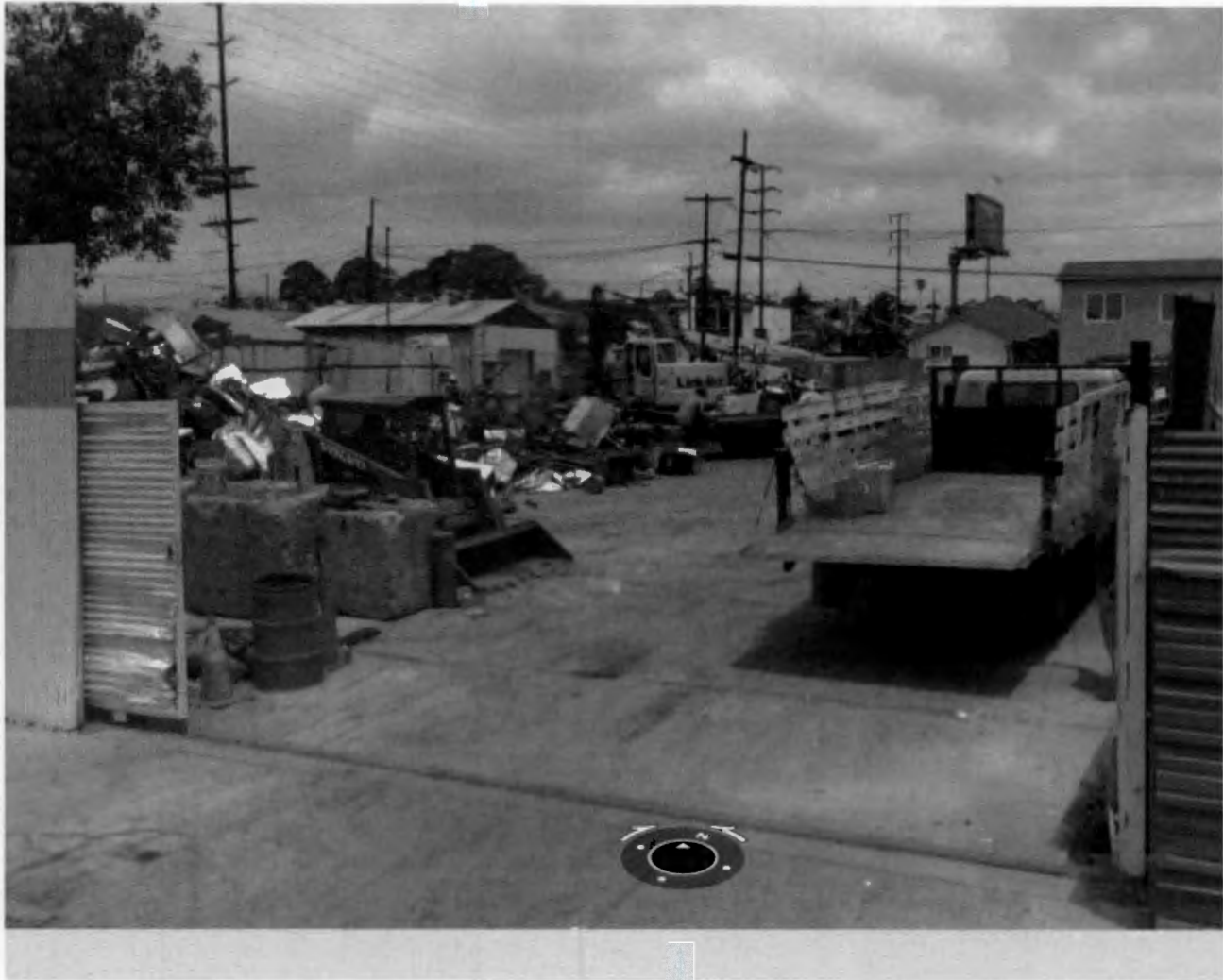




Aerial Bing Maps



Bing Maps Street View



Bing Maps Street View

**EXHIBIT B**



# **Qualifying Rainfall Events (.1 inches of rain or more) During Business Hours**

## **NOAA National Climactic Data Center**

**Stations:** COOP:047740 - SAN DIEGO LINDBERGH FIELD, CA US

**Data Types:** HPCP - Precipitation (100th of an inch)

**2009**

<u>Month</u>	<u>Inches</u>	<u>Time:</u>
6-Feb	0.61	
7-Feb	0.74	
8-Feb	0.2	
9-Feb	0.21	8:00 AM
10-Feb	0.34	
14-Feb	0.13	
16-Feb	0.62	12:00 PM
22-Mar	0.22	11:00 AM
31-May	0.13	
4-Jun	0.13	
29-Nov	0.35	
7-Dec	0.13	9:00 AM
8-Dec	1.99	
12-Dec	0.13	
13-Dec	0.88	
<b>TOTAL</b>	<b>6.81</b>	

**2010**

<u>Month</u>	<u>Inches</u>	<u>Time:</u>
18-Jan	0.1	4:00 PM
19-Jan	1.4	1:00 PM
20-Jan	7.4	
21-Jan	1.65	12:00 PM
22-Jan	1.41	
23-Jan	0.29	
27-Jan	0.14	
6-Feb	0.17	11:00 AM
7-Feb	0.27	
10-Feb	0.47	
20-Feb	0.49	
22-Feb	0.12	
27-Feb	0.2	
28-Feb	1.27	
7-Mar	0.38	10:00 AM
8-Mar	0.3	
1-Apr	0.49	
6-Apr	0.15	
12-Apr	0.65	4:30 PM
22-Apr	0.47	
6-Oct	0.43	
20-Oct	0.9	12:00 PM
21-Oct	0.12	
30-Oct	0.38	8:00 AM
20-Nov	0.69	2:00 PM
21-Nov	0.12	11:00 AM
24-Nov	0.87	
20-Dec	0.83	
21-Dec	3.46	8:00 AM
22-Dec	0.48	8:00 AM
26-Dec	0.69	
30-Dec	1.8	9:00 AM
<b>TOTAL</b>	<b>28.59</b>	

# **Qualifying Rainfall Events (.1 inches of rain or more) During Business Hours**

## **NOAA National Climactic Data Center**

**Stations: COOP:047740 - SAN DIEGO LINDBERGH FIELD, CA US**

**Data Types: HPCP - Precipitation (100th of an inch)**

**2011**

<u>Month</u>	<u>Inches</u>	<u>Time:</u>
3-Jan	0.85	
4-Jan	0.1	
18-Feb	0.24	5:00 AM
20-Feb	0.2	
26-Feb	0.8	
27-Feb	0.22	
7-Mar	0.2	
21-Mar	0.89	
22-Mar	0.14	
24-Mar	0.25	
26-Mar	0.15	
9-Apr	0.14	
18-May	0.73	
29-May	0.1	
4-Nov	0.34	4:00 PM
12-Nov	1.04	1:00 PM
12-Dec	0.96	9:00 AM
<b>TOTAL</b>	<b>7.35</b>	

**2012**

<u>Month</u>	<u>Inches</u>	<u>Time:</u>
23-Jan	0.2	2:00 PM
24-Jan	0.28	
7-Feb	0.23	4:00 PM
14-Feb	0.34	
16-Feb	0.2	
28-Feb	0.72	
17-Mar	0.24	1:00 PM
18-Mar	0.47	
25-Mar	0.43	5:00 PM
1-Apr	0.11	
11-Apr	0.45	
13-Apr	0.33	4:00 PM
26-Apr	0.61	
12-Oct	0.77	
8-Nov	0.14	
1-Dec	0.23	
13-Dec	1.6	8:00 AM
14-Dec	0.28	
15-Dec	0.37	
19-Dec	0.47	
25-Dec	0.37	
30-Dec	0.28	
<b>TOTAL</b>	<b>9.12</b>	

**Qualifying Rainfall Events (.1 inches of rain or more) During Business Hours**

**NOAA National Climatic Data Center**

**Stations: COOP:047740 - SAN DIEGO LINDBERGH FIELD, CA US**

**Data Types: HPCP - Precipitation (100th of an inch)**

**2013**

<u>Month</u>	<u>Inches</u>
7-Jan	0.26
25-Jan	0.23
26-Jan	0.73
27-Jan	0.1
9-Feb	0.15
20-Feb	0.3
9-Mar	0.2
21-Nov	0.28
22-Nov	0.2
8-Dec	0.17
20-Dec	0.1
<b>TOTAL</b>	<b>2.72</b>

**2014**

<u>Month</u>	<u>Inches</u>
3-Feb	0.25
7-Feb	0.37
27-Feb	0.1
28-Feb	0.46
1-Mar	0.76
2-Mar	0.6
2-Apr	0.22
26-Apr	0.13
<b>TOTAL</b>	<b>2.89</b>



## EXHIBIT C

# INDUSTRIAL STORMWATER

## FACT SHEET SERIES

### ***Sector N: Scrap Recycling and Waste Recycling Facilities***



U.S. EPA Office of Water  
EPA-833-F-06-029  
December 2006

### ***What is the NPDES stormwater program for industrial activity?***

Activities, such as material handling and storage, equipment maintenance and cleaning, industrial processing or other operations that occur at industrial facilities are often exposed to stormwater. The runoff from these areas may discharge pollutants directly into nearby waterbodies or indirectly via storm sewer systems, thereby degrading water quality.

In 1990, the U.S. Environmental Protection Agency (EPA) developed permitting regulations under the National Pollutant Discharge Elimination System (NPDES) to control stormwater discharges associated with eleven categories of industrial activity. As a result, NPDES permitting authorities, which may be either EPA or a state environmental agency, issue stormwater permits to control runoff from these industrial facilities.

### ***What types of industrial facilities are required to obtain permit coverage?***

This fact sheet specifically discusses stormwater discharges various industries including scrap recycling and waste recycling facilities as defined by Standard Industrial Classification (SIC) Major Group Code 50 (5093). Facilities and products in this group fall under the following categories, all of which require coverage under an industrial stormwater permit:

- ◆ *Scrap and waste recycling facilities (non-source separated, non-liquid recyclable materials)* engaged in processing, reclaiming, and wholesale distribution of scrap and waste materials such as ferrous and nonferrous metals, paper, plastic, cardboard, glass, and animal hides.
- ◆ *Waste recycling facilities (liquid recyclable materials)* engaged in reclaiming and recycling liquid wastes such as used oil, antifreeze, mineral spirits, and industrial solvents.
- ◆ *Recycling facilities* that only receive source-separated recyclable materials primarily from non-industrial and residential sources (i.e., common consumer products including paper, newspaper, glass, cardboard, plastic containers, aluminum and tin cans); including recycling facilities commonly referred to as material recovery facilities (MRF).

### ***What does an industrial stormwater permit require?***

Common requirements for coverage under an industrial stormwater permit include development of a written stormwater pollution prevention plan (SWPPP), implementation of control measures, and submittal of a request for permit coverage, usually referred to as the Notice of Intent or NOI. The SWPPP is a written assessment of potential sources of pollutants in stormwater runoff and control measures that will be implemented at your facility to minimize the discharge of these pollutants in runoff from the site. These control measures include site-specific best management practices (BMPs), maintenance plans, inspections, employee training, and reporting. The procedures detailed in the SWPPP must be implemented by the facility and updated as necessary, with a copy of the SWPPP kept on-site. The industrial stormwater permit also requires collection of visual, analytical, and/or compliance monitoring data to determine the effectiveness of implemented BMPs. For more information on EPA's industrial stormwater permit and links to State stormwater permits, go to [www.epa.gov/npdes/stormwater](http://www.epa.gov/npdes/stormwater) and click on "Industrial Activity."

### ***What pollutants are associated with activities at my facility?***

Pollutants conveyed in stormwater discharges from scrap recycling and waste recycling facilities will vary. There are a number of factors that influence to what extent industrial activities and significant materials can affect water quality.

- ◆ Geographic location
- ◆ Topography
- ◆ Hydrogeology
- ◆ Extent of impervious surfaces (e.g., concrete or asphalt)
- ◆ Type of ground cover (e.g., vegetation, crushed stone, or dirt)
- ◆ Outdoor activities (e.g., material storage, loading/unloading, vehicle maintenance)
- ◆ Size of the operation
- ◆ Type, duration, and intensity of precipitation events

Each scrap recycling and waste recycling facility is unique in regards to sources, type, and volume of contaminated stormwater discharges. Sources of pollutants other than stormwater, such as illicit connections, spills, and other improperly dumped materials, may increase pollutant loadings in discharges. Each of the three types of facilities included in the scrap recycling and waste recycling facilities group are dissimilar from one another in the operations and types of materials handled. As a result, there is variation in pollutants for which BMPs may be necessary to address.

The activities, pollutant sources, and pollutants detailed in Table 1 are commonly found at scrap recycling and waste recycling facilities.

**Table 1. Common Activities, Pollutant Sources, and Associated Pollutants at Scrap Recycling and Waste Recycling Facilities**

Activity	Pollutant Source	Pollutant
<i>Scrap and Waste Recycling Facilities (non-source separated, non-liquid recyclable materials)</i>		
Stockpiling and storage of materials (including loading and unloading)	Leaking of various fluids from used automotive engines, radiators, brake fluid reservoirs, transmission housings, other vehicle parts, and lead-acid from batteries	PCBs, oil and grease, lubricants, paint pigments or additives, heavy metals, ionizing radioactive isotopes, transmission and brake fluids, fuel, battery acid, lead acid, antifreeze, benzene, chemical residue, heating oil, petroleum products, solvents, ionizing radioactive isotopes, infectious/bacterial contamination, asbestos, metals, total Kjeldahl nitrogen (TKN), battery acid, oily wastes, chemical residue
	Deterioration/corrosion of materials	
Material processing: Air pollution equipment (including incinerators, furnaces, wet scrubbers, filter houses, and bag houses)	Normal equipment operations that include the collection and disposal of filter bag material and ash, process wastewater from scrubbers, accumulation of particulate matter around leaking joint connections, malfunctioning pumps and motors (e.g., leaking gaskets, seals or pipe connections, leaking oil-filled transformer casings)	Hydraulic fluids, oils, fuels, grease and other lubricants, accumulated particulate matter, chemical additives, and PCBs from oil-filled electrical equipment.



**INDUSTRIAL STORMWATER FACT SHEET SERIES**  
**Sector N: Scrap Recycling and Waste Recycling Facilities**

**Table 1. Common Activities, Pollutant Sources, and Associated Pollutants at Scrap Recycling and Waste Recycling Facilities (continued)**

Activity	Pollutant Source	Pollutant
Material processing: Combustion engines	Spills and/or leaks from fuel tanks, spills/leaks from oil/hydraulic fuel reservoirs, faulty/leaking hose connections, worn gaskets, leaking transmissions, crankcases, and brake systems (if applicable), leaking battery casings and/or corroded terminals	Accumulated particulate matter, oil/lubricants, gas/diesel fuel, fuel additives, antifreeze (ethylene glycol), battery acid, and products of incomplete combustion
Material processing: Material handling systems (forklifts, cranes, and conveyors)	Spills and leaks from fuel tanks, hydraulic and oil reservoirs due to malfunction parts (e.g., worn gaskets and parts, leaking hose connections, and faulty seals).	Hydraulic fluids, oils, fuels and fuel additives, grease and other lubricants, accumulated particulate matter, chemical additives, mercury, lead, battery acid
	Damaged or faulty electrical switches (mercury filled).	
	Damaged or leaking battery casings, including exposed corroded battery terminals.	
	Damaged or worn bearing housings	
Material processing: Stationary scrap processing facilities (balers, briquetters, shredders, shearers, compactors, engine block/cast iron breakers, wire chopper, turnings crusher)	Leaks from hydraulic reservoirs, hose and fitting connections, worn gaskets, spills or leaks from fuel tanks, particulates/residue from scrap processing, malfunctioning pumps and motors (e.g., leaking gaskets, seals or pipe connections, leaking oil-filled transformer casings)	Heavy metals (e.g., zinc, copper, lead, cadmium, chromium) and hydraulic fluids, PCBs
Material processing: Hydraulic equipment and systems, balers/briquetter, shredders, shearers, compactors, engine block/cast iron breaker, wire chopper, turnings crusher	Particulate/residue from material processing, spills and/or leaks from fuel tanks, spills/leaks from oil/hydraulic fuel reservoirs, faulty/leaking hose connections/fittings, leaking gaskets	Hydraulic fluids/oils, lubricants, particulate matter from combustion engines, PCBs (oilfilled electrical equipment components), heavy metals (nonferrous, ferrous)
Material processing: Electrical control systems (transformers, electrical switch gear, motor starters)	Oil leakage from transformers, leakage from mercury float switches, faulty detection devices	PCBs, mercury (float switches), ionizing radioactive material (fire/smoke detection systems)
Material processing: Torch cutting	Residual/accumulated particulates	Heavy metal fragments, fines
Material handling systems	Spills and/or leaks from fuel tanks, spills/leaks from oil/hydraulic fuel reservoirs, faulty/leaking hose connections/fittings, leaking gaskets	Accumulated particulate matter (ferrous and nonferrous metals, plastics, rubber, other), oil/lubricants, PCBs (electrical equipment), mercury (electrical controls), lead/battery acids
Vehicle maintenance	Parts cleaning, waste disposal of rags, oil filters, air filters, batteries, hydraulic fluids, transmission fluids, brake fluids, coolants, lubricants, degreasers, spent solvents	Gas/diesel fuel, fuel additives, oil/lubricants, heavy metals, brake fluids, transmission fluids, chlorinated solvents, arsenic
Vehicle fueling	Spills and leaks during fuel transfer, spills due to "topping off" tanks, runoff from fueling areas, washdown of fueling areas, leaking storage tanks, spills of oils, brake fluids, transmission fluids, engine coolants	Gas/diesel fuel, fuel additives, oil, lubricants, heavy metals
Vehicle and equipment cleaning and washing	Washing and steam cleaning	Solvent cleaners, oil/lubricants/additives, antifreeze (ethylene glycol)

**INDUSTRIAL STORMWATER FACT SHEET SERIES**  
**Sector N: Scrap Recycling and Waste Recycling Facilities**

**Table 1. Common Activities, Pollutant Sources, and Associated Pollutants at Scrap Recycling and Waste Recycling Facilities (continued)**

Activity	Pollutant Source	Pollutant
<i>Waste Recycling Facilities (liquid recyclable materials)</i>		
Drum/individual container storage and handling	Leaks or spills due to faulty container/drum integrity (e.g., leaking seals or ports). Container materials incompatible with waste material. Improper stacking and storage of containers	Mineral spirits, industrial solvents, immersion cleaners, dry cleaner, solvents, paint solvents, spent antifreeze
Return and fill stations	Leaks, spills, or overflows from tanker truck transfer of wastes and hose drainage. Leaking pipes, valves, pumps, worn or deteriorated gaskets or seals	Mineral spirits, industrial solvents, immersion cleaners, dry cleaner, solvents, paint solvents, spent antifreeze
Storage tank operations	Overfill of storage tanks, leaking pipes, valves, worn or deteriorated pumps seals. Leaking underground storage tanks.	Mineral spirits, industrial solvents, immersion cleaners, dry cleaner, solvents, paint solvents, spent antifreeze
Material handling equipment	Leaking fuel lines, worn gaskets, leaking hydraulic lines and connections	Fuel, hydraulic fluid, oil and grease
Vehicle and equipment maintenance (if applicable)	Replacement of fluids such as transmission and brake fluids, antifreeze, oil and other lubricants, washdown of maintenance areas, dumping fluids down floor drains connected to storm sewer system, outside storage of fluids and oily rags and waste material	Oil and grease, fuel, accumulated particulate matter, antifreeze
Vehicle or equipment washing (if applicable)	Wash water or steam cleaning	Oil, detergents, chlorinated solvents, suspended solids and accumulated particulate matter
<i>Recycling Facilities</i>		
Unknowing acceptance of nonrecyclable materials and/or small quantities of household hazardous wastes	Inbound recyclable materials	Dependant on material
Outdoor material storage	Deterioration of wastepaper and unprocessed aluminum beverage containers	Biochemical oxygen demand (BOD)
Processing and storage	Illicit connections or improper dumping to floor drains discharging to a storm sewer system Washing down tipping floor areas	Dependant on material
Vehicle maintenance	Replacement of fluids such as transmission and brake fluids, antifreeze, oil and other lubricants, washdown of maintenance areas, dumping fluids down floor drains connected to storm sewer system, outside storage of fluids and oily rags and waste material	Oil and grease, gas/diesel fuel, accumulated particulate matter, antifreeze (ethylene glycol)



### ***What BMPs can be used to minimize contact between stormwater and potential pollutants at my facility?***

A variety of BMP options may be applicable to eliminate or minimize the presence of pollutants in stormwater discharges from scrap recycling and waste recycling facilities. You will likely need to implement a combination or suite of BMPs to address stormwater runoff at your facility. Your first consideration should be for pollution prevention BMPs, which are designed to prevent or minimize pollutants from entering stormwater runoff and/or reduce the volume of stormwater requiring management. Prevention BMPs can include regular cleanup, collection and containment of debris in storage areas, and other housekeeping practices, spill control, and employee training. It may also be necessary to implement treatment BMPs, which are engineered structures intended to treat stormwater runoff and/or mitigate the effects of increased stormwater runoff peak rate, volume, and velocity. Treatment BMPs are generally more expensive to install and maintain and include oil-water separators, wet ponds, and proprietary filter devices.

BMPs must be selected and implemented to address the following:

#### **Good Housekeeping Practices**

Good housekeeping is a practical, cost-effective way to maintain a clean and orderly facility to prevent potential pollution sources from coming into contact with stormwater. It includes establishing protocols to reduce the possibility of mishandling materials or equipment and training employees in good housekeeping techniques. Common areas where good housekeeping practices should be followed include trash containers and adjacent areas, material storage areas, vehicle and equipment maintenance areas, and loading docks. Good housekeeping practices must include a schedule for regular pickup and disposal of garbage and waste materials and routine inspections of drums, tanks, and containers for leaks and structural conditions. Practices also include containing and covering garbage, waste materials, and debris. Involving employees in routine monitoring of housekeeping practices has proven to be an effective means of ensuring the continued implementation of these measures.

#### **Minimizing Exposure**

Where feasible, minimizing exposure of potential pollutant sources to precipitation is an important control option. Minimizing exposure prevents pollutants, including debris, from coming into contact with precipitation and can reduce the need for BMPs to treat contaminated stormwater runoff. It can also prevent debris from being picked up by stormwater and carried into drains and surface waters. Examples of BMPs for exposure minimization include covering materials or activities with temporary structures (e.g., tarps) when wet weather is expected or moving materials or activities to existing or new permanent structures (e.g., buildings, silos, sheds). Even the simple practice of keeping a dumpster lid closed can be a very effective pollution prevention measure.

#### **Erosion and Sediment Control**

BMPs must be selected and implemented to limit erosion on areas of your site that, due to topography, activities, soils, cover, materials, or other factors are likely to experience erosion. Erosion control BMPs such as seeding, mulching, and sodding prevent soil from becoming dislodged and should be considered first. Sediment control BMPs such as silt fences, sediment ponds, and stabilized entrances trap sediment after it has eroded. Sediment control BMPs should be used to back-up erosion control BMPs.

#### **Management of Runoff**

Your SWPPP must contain a narrative evaluation of the appropriateness of stormwater management practices that divert, infiltrate, reuse, or otherwise manage stormwater runoff so as to reduce the discharge of pollutants. Appropriate measures are highly site-specific, but may include, among others, vegetative swales, collection and reuse of stormwater, inlet controls, snow management, infiltration devices, and wet retention measures.



# INDUSTRIAL STORMWATER FACT SHEET SERIES

## Sector N: Scrap Recycling and Waste Recycling Facilities

A combination of preventive and treatment BMPs will yield the most effective stormwater management for minimizing the offsite discharge of pollutants via stormwater runoff. Though not specifically outlined in this fact sheet, BMPs must also address preventive maintenance records or logbooks, regular facility inspections, spill prevention and response, and employee training.

All BMPs require regular maintenance to function as intended. Some management measures have simple maintenance requirements, others are quite involved. You must regularly inspect all BMPs to ensure they are operating properly, including during runoff events. As soon as a problem is found, action to resolve it should be initiated immediately.

Implement BMPs, such as those listed below in Table 2 for the control of pollutants at scrap recycling and waste recycling facilities, to minimize and prevent the discharge of pollutants in stormwater. Identifying weaknesses in current facility practices will aid the permittee in determining appropriate BMPs that will achieve a reduction in pollutant loadings. BMPs listed in Table 2 are broadly applicable to scrap recycling and waste recycling facilities; however, this is not a complete list and you are recommended to consult with regulatory agencies or a stormwater engineer/consultant to identify appropriate BMPs for your facility.

**Table 2. BMPs for Potential Pollutant Sources at Scrap Recycling and Waste Recycling Facilities**

Activity	BMPs
<i>Scrap and Waste Recycling Facilities (non-source separated, non-liquid recyclable materials)</i>	
Inbound recyclable and waste material control	<ul style="list-style-type: none"> <li><input type="checkbox"/> Provide information/education to suppliers of scrap and recyclable waste materials on draining and properly disposing of residual fluids (e.g., from vehicles and equipment engines, radiators and transmissions, oil filled transformers, and individual containers or drums), prior to delivery to your facility.</li> <li><input type="checkbox"/> Create a written list of materials that will not be accepted at the facility and materials that will be accepted, but require special handling procedures.</li> <li><input type="checkbox"/> Train employees engaged in the inspection and acceptance of inbound recyclable materials.</li> <li><input type="checkbox"/> Inspect incoming materials for items on the prohibited materials/ special handling list. Have truck drivers picking up loads offsite conduct preliminary inspections for items on the list before hauling.</li> <li><input type="checkbox"/> Check incoming scrap materials for potential fluid contents and batteries.</li> <li><input type="checkbox"/> Drain all fluids from vehicles upon arrival at the site. Segregate the fluids and properly store or dispose of them. Drain fluids only in designated area over impervious surfaces or drip pans. Contain the area to prevent stormwater run-on and runoff. Cover area with roofs or tarps.</li> <li><input type="checkbox"/> Keep waste streams separate (e.g., waste oil and mineral spirits).</li> <li><input type="checkbox"/> Store liquid wastes, including used oil, in materially compatible and non-leaking containers and disposed or recycled in accordance with RCRA. Nonhazardous substances that are contaminated with a hazardous substance are considered a hazardous substance.</li> <li><input type="checkbox"/> Recycle antifreeze, gasoline, used oil, mineral spirits, and solvents.</li> <li><input type="checkbox"/> Dispose of greasy rags, oil filters, air filters, batteries, spent coolant, and degreasers properly.</li> <li><input type="checkbox"/> Label and track the recycling of waste material (e.g., used oil, spent solvents, batteries).</li> <li><input type="checkbox"/> Drain oil filters before disposal or recycling.</li> <li><input type="checkbox"/> Store cracked batteries in a nonleaking secondary container.</li> <li><input type="checkbox"/> Promptly transfer used fluids to the proper container. Do not leave full drip pans or other open containers around the shop. Empty and clean drip pans and containers.</li> <li><input type="checkbox"/> Do not pour liquid waste down floor drains, sinks, or outdoor storm drain inlets.</li> </ul>

**INDUSTRIAL STORMWATER FACT SHEET SERIES**  
**Sector N: Scrap Recycling and Waste Recycling Facilities**

**Table 2. BMPs for Potential Pollutant Sources at Scrap Recycling and Waste Recycling Facilities (continued)**

Activity	BMPs
Inbound recyclable and waste material control (continued)	<ul style="list-style-type: none"> <li><input type="checkbox"/> Plug floor drains that are connected to the storm or sanitary sewer. If necessary, install a sump that is pumped regularly.</li> <li><input type="checkbox"/> Inspect the maintenance area regularly for proper implementation of control measures.</li> <li><input type="checkbox"/> Filter stormwater discharges with devices such as oil/water separators.</li> <li><input type="checkbox"/> Train employees on proper waste control and disposal procedures.</li> <li><input type="checkbox"/> Establish and implement procedures to educate auto scrap providers of need to remove mercury switches from hood and trunk lighting units and anti-lock break system units.</li> </ul>
Outside scrap material storage: (liquids)	<ul style="list-style-type: none"> <li><input type="checkbox"/> Use drip pans under all vehicles and equipment waiting for processing.</li> <li><input type="checkbox"/> Store batteries on impervious surfaces. Curb, dike, or berm this area.</li> <li><input type="checkbox"/> Confine storage to designated areas.</li> <li><input type="checkbox"/> Cover all storage areas with a permanent (e.g., roofs) or temporary cover (e.g., canvas tarps).</li> <li><input type="checkbox"/> Install diversion devices such as curbing, berms, containment trenches, culverts, or dikes around storage areas.</li> <li><input type="checkbox"/> Install oil/water separators, sumps, and dry absorbents for areas where potential sources of residual fluids are stockpiled (e.g., automobile engine storage areas).</li> <li><input type="checkbox"/> Inspect the storage yard for filled drip pans and other problems regularly.</li> <li><input type="checkbox"/> Train employees on procedures for storage and inspection items.</li> </ul>
Scrap material storage: (bulk solid materials)	<ul style="list-style-type: none"> <li><input type="checkbox"/> Minimize runoff from coming into areas where significant materials are stored (e.g., diversion structures such as curbing, berms, containment trenches, surface grading, and elevated concrete pads) or other equivalent measure.</li> <li><input type="checkbox"/> Use adsorbents or collect leaks or spills of oil, fuel, transmission, and brake fluids (e.g., dry absorbent, drip pans).</li> <li><input type="checkbox"/> Locate spill pans under stored vehicles.</li> <li><input type="checkbox"/> Install media filters such as catch basin and sand filters.</li> <li><input type="checkbox"/> Install oil/water separator in storage areas with vehicle transmissions and engines.</li> <li><input type="checkbox"/> Provide nonrecyclable waste storage bins and containers.</li> <li><input type="checkbox"/> Conduct periodic inspections. Conduct preventative maintenance as necessary.</li> <li><input type="checkbox"/> Provide equipment operator training to minimize damage to controls (e.g., curbing and berms).</li> </ul>
Other storage: (lightweight materials)	<ul style="list-style-type: none"> <li><input type="checkbox"/> Maintain good integrity of all storage containers.</li> <li><input type="checkbox"/> Install safeguards (such as diking or berming) against accidental releases.</li> <li><input type="checkbox"/> Inspect storage tanks to detect potential leaks and perform preventive maintenance.</li> <li><input type="checkbox"/> Inspect piping systems (pipes, pumps, flanges, couplings, hoses, and valves) for failures or leaks.</li> <li><input type="checkbox"/> Train employees on proper filling and transfer procedures.</li> </ul>
Scrap processing operations	<ul style="list-style-type: none"> <li><input type="checkbox"/> Provide containment bins or equivalent for shredded material, especially lightweight materials such as fluff (preferably at the discharge of these materials from the air classification system).</li> <li><input type="checkbox"/> Provide cover over hydraulic equipment and combustion engines. Provide dry-cleanup materials (e.g., dry-adsorbents, drip pans, etc.) to prevent contact of hydraulic fluids, oils, fuels, etc., with stormwater runoff.</li> </ul>

**INDUSTRIAL STORMWATER FACT SHEET SERIES**  
**Sector N: Scrap Recycling and Waste Recycling Facilities**

**Table 2. BMPs for Potential Pollutant Sources at Scrap Recycling and Waste Recycling Facilities (continued)**

Activity	BMPs
Scrap processing operations (continued)	<ul style="list-style-type: none"> <li><input type="checkbox"/> Site process equipment on elevated concrete pads or provide runoff diversion structures around process equipment, berms, containment trenches surface grading, or other equivalent measure. Discharge runoff from within bermed areas to a sump, oil/water separator, media filter, or discharge to sanitary sewer.</li> <li><input type="checkbox"/> Stabilize high traffic areas (e.g., concrete pads, gravel, and pavement around processing equipment) where practicable.</li> <li><input type="checkbox"/> Provide alarm, pump shutoff, or sufficient containment for hydraulic reservoirs in the event of a line break.</li> <li><input type="checkbox"/> Provide site gages or overfill protection devices for all liquid and fuel storage reservoirs and tanks.</li> <li><input type="checkbox"/> Schedule frequent cleaning of accumulated fluids and particulate residue around all scrap processing equipment.</li> <li><input type="checkbox"/> Schedule frequent inspections of equipment for spills or leakage of fluids, oil, fuel, and/or hydraulic fluids due to malfunctioning, worn, or corroded parts or equipment.</li> <li><input type="checkbox"/> Conduct routine preventive maintenance of equipment per original manufacturer's equipment (OME) recommendations. Replace worn or malfunctioning parts.</li> <li><input type="checkbox"/> Conduct periodic maintenance and clean out of all sumps, oil/water separators, and/or media filters. Dispose of residual waste materials properly (e.g., according to RCRA).</li> <li><input type="checkbox"/> Install retention/detention ponds or basins, sediment traps, vegetated swales or strips for pollutant settling/filtration.</li> <li><input type="checkbox"/> Establish spill prevention and response procedures, including employee training.</li> <li><input type="checkbox"/> Provide training to equipment operators on how to minimize exposure of runoff to scrap processing areas.</li> </ul>
Scrap lead acid battery program	<ul style="list-style-type: none"> <li><input type="checkbox"/> Store batteries indoors on an impervious surface. Raise batteries off the floor with pallets or store in covered, leak-proof containers.</li> <li><input type="checkbox"/> Separate all scrap batteries from other scrap materials.</li> <li><input type="checkbox"/> Establish procedures for the collection, storage, handling, and disposition of cracked or broken batteries in accordance with applicable Federal regulations (e.g., RCRA).</li> <li><input type="checkbox"/> Establish special handling procedures for cracked or broken batteries. Neutralize acid leaks with sodium carbonate, soda ash, or other absorbent materials.</li> <li><input type="checkbox"/> Establish inspection and acceptance procedures for scrap lead-acid batteries. Provide supplier training on acceptance practices for scrap batteries.</li> <li><input type="checkbox"/> Provide employee training on the safe handling, storage, and disposition of scrap batteries.</li> </ul>
Supplies for Process Equipment	<ul style="list-style-type: none"> <li><input type="checkbox"/> Locate storage drums containing liquids, including oils and lubricants indoors. Alternatively, site palletized drums and containers on an impervious surface and provide sufficient containment around the materials. Provide sumps and/or oil/water separators, if necessary.</li> <li><input type="checkbox"/> Conduct periodic inspections of containment areas and containers/drums for corrosion.</li> <li><input type="checkbox"/> Perform preventive maintenance of BMPs, as necessary.</li> <li><input type="checkbox"/> Instruct employees on proper material handling and storage procedures.</li> </ul>
Vehicle and equipment maintenance	<p>Good Housekeeping</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Plug floor drains that are connected to the storm or sanitary sewer; if necessary, install a sump that is pumped regularly.</li> <li><input type="checkbox"/> Maintain an organized inventory of materials used in the maintenance shop.</li> </ul>



**INDUSTRIAL STORMWATER FACT SHEET SERIES**  
**Sector N: Scrap Recycling and Waste Recycling Facilities**

**Table 2. BMPs for Potential Pollutant Sources at Scrap Recycling and Waste Recycling Facilities (continued)**

Activity	BMPs
Vehicle and equipment maintenance (continued)	<p>Good Housekeeping (continued)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Use drip plans, drain boards, and drying racks to direct drips back into a sink or fluid holding tank for re-use.</li> <li><input type="checkbox"/> Drain all parts of fluids prior to disposal. Oil filters can be crushed and recycled.</li> <li><input type="checkbox"/> Promptly transfer used fluids to the proper container; do not leave full drip pans or other open containers around the shop. Empty and clean drip pans and containers.</li> <li><input type="checkbox"/> Dispose of greasy rags, oil filters, air filters, batteries, spent coolant, and degreasers properly.</li> <li><input type="checkbox"/> Label and track the recycling of waste material (e.g., used oil, spent solvents, batteries).</li> <li><input type="checkbox"/> Maintain an organized inventory of materials.</li> <li><input type="checkbox"/> Eliminate or reduce the number or amount of hazardous materials and waste by substituting nonhazardous or less hazardous materials.</li> <li><input type="checkbox"/> Clean up leaks, drips, and other spills without using large amounts of water.</li> <li><input type="checkbox"/> Prohibit the practice of hosing down an area where the practice would result in the exposure of pollutants to stormwater.</li> <li><input type="checkbox"/> Clean without using liquid cleaners whenever possible.</li> <li><input type="checkbox"/> Do all cleaning at a centralized station so the solvents stay in one area.</li> <li><input type="checkbox"/> If parts are dipped in liquid, remove them slowly to avoid spills.</li> <li><input type="checkbox"/> Do not pour liquid waste down floor drains, sinks, outdoor storm drain inlets, other storm drains, or sewer connections.</li> </ul> <p>Minimizing Exposure</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Perform all cleaning operations indoors or under covering when possible. Conduct the cleaning operations in an area with a concrete floor with no floor drainage other than to sanitary sewers or treatment facilities.</li> <li><input type="checkbox"/> If operations are uncovered, perform them on concrete pad that is impervious and contained.</li> <li><input type="checkbox"/> Park vehicles and equipment indoors or under a roof whenever possible where proper control of oil leaks/spills is maintained and exposure to stormwater is prevented.</li> <li><input type="checkbox"/> Watch vehicles closely for leaks and use pans to collect fluid when leaks occur.</li> </ul> <p>Management of Runoff</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Use berms, curbs, or similar means to ensure that stormwater runoff from other parts of the facility does not flow over the maintenance area.</li> <li><input type="checkbox"/> Collect the stormwater runoff from the cleaning area and providing treatment or recycling. Discharge vehicle wash or rinse water to the sanitary sewer (if allowed by sewer authority), wastewater treatment, a land application site, or recycled on-site. DO NOT discharge washwater to a storm drain or surface water.</li> </ul> <p>Inspections and Training</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Inspect the maintenance area regularly for proper implementation of control measures.</li> <li><input type="checkbox"/> Train employees on proper waste control and disposal procedures.</li> </ul>



**INDUSTRIAL STORMWATER FACT SHEET SERIES**  
**Sector N: Scrap Recycling and Waste Recycling Facilities**

**Table 2. BMPs for Potential Pollutant Sources at Scrap Recycling and Waste Recycling Facilities (continued)**

Activity	BMPs
Vehicle fueling	<ul style="list-style-type: none"> <li><input type="checkbox"/> Conduct fueling operations (including the transfer of fuel from tank trucks) on an impervious or contained pad or under a roof or canopy where possible. Covering should extend beyond spill containment pad to prevent rain from entering.</li> <li><input type="checkbox"/> When fueling in uncovered area, use a concrete pad (not asphalt which is not chemically resistant to the fuels being handled).</li> <li><input type="checkbox"/> Use drip pans where leaks or spills of fuel can occur and where making and breaking hose connections.</li> <li><input type="checkbox"/> Use fueling hoses with check valves to prevent hose drainage after filling.</li> <li><input type="checkbox"/> Use spill and overflow protection devices.</li> <li><input type="checkbox"/> Clean up spills and leaks immediately.</li> <li><input type="checkbox"/> Minimize/eliminate run-on onto fueling areas with diversion dikes, berms, curbing, surface grading or other equivalent measures.</li> <li><input type="checkbox"/> Collect stormwater runoff and provide treatment or recycling.</li> <li><input type="checkbox"/> Use dry cleanup methods for fuel area rather than hosing the fuel area down.</li> <li><input type="checkbox"/> Perform preventive maintenance on storage tanks to detect potential leaks before they occur.</li> <li><input type="checkbox"/> Inspect the fueling area to detect problems before they occur.</li> <li><input type="checkbox"/> Train personnel on proper fueling procedures.</li> <li><input type="checkbox"/> Provide curbing or posts around fuel pumps to prevent collisions during vehicle ingress and egress.</li> <li><input type="checkbox"/> Discourage "topping off" of fuel tanks.</li> </ul>
Outdoor vehicle parking and storage	<ul style="list-style-type: none"> <li><input type="checkbox"/> Cover vehicle and equipment storage areas.</li> <li><input type="checkbox"/> Use drip pans under all equipment and vehicles waiting maintenance.</li> <li><input type="checkbox"/> Conduct inspections of storage and parking areas for leaks and filled drip pans.</li> <li><input type="checkbox"/> Provide employee training.</li> </ul>
Vehicle and equipment washing	<ul style="list-style-type: none"> <li><input type="checkbox"/> Designate an area for cleaning activities.</li> <li><input type="checkbox"/> Use detergent or water-based cleaning systems in place of organic solvent degreasers.</li> <li><input type="checkbox"/> Use phosphate-free biodegradable detergents.</li> <li><input type="checkbox"/> Avoid washing parts or equipment outside.</li> <li><input type="checkbox"/> Use auto shutoff valves on washing equipment.</li> <li><input type="checkbox"/> Provide vehicle wash rack with dedicated sediment trap and oil/water separator.</li> <li><input type="checkbox"/> Install curbing, berms, or dikes around cleaning areas.</li> <li><input type="checkbox"/> Inspect cleaning area regularly.</li> <li><input type="checkbox"/> Train employees on proper washing procedures.</li> <li><input type="checkbox"/> Contain steam cleaning washwaters. Discharge to sanitary sewer in compliance with POTW pre-treatment standards, dispose via licensed waste hauler, or discharge under an applicable NPDES permit.</li> </ul>

**INDUSTRIAL STORMWATER FACT SHEET SERIES**  
**Sector N: Scrap Recycling and Waste Recycling Facilities**

**Table 2. BMPs for Potential Pollutant Sources at Scrap Recycling and Waste Recycling Facilities (continued)**

Activity	BMPs
Vehicle and equipment painting (where applicable)	<ul style="list-style-type: none"> <li><input type="checkbox"/> Conduct sanding and painting in nonexposed areas (e.g., under cover) in accordance with OSHA standards.</li> <li><input type="checkbox"/> Minimize overspraying.</li> <li><input type="checkbox"/> Clean up accumulated particulate matter.</li> <li><input type="checkbox"/> Dispose or recycle paint, solvents, and thinner properly.</li> <li><input type="checkbox"/> Keep paint and solvents away from traffic areas.</li> <li><input type="checkbox"/> Conduct periodic inspections of paint spraying areas.</li> <li><input type="checkbox"/> Provide training on control procedures for employees.</li> </ul>
Erosion and sediment control	<ul style="list-style-type: none"> <li><input type="checkbox"/> Minimize run-on from adjacent properties using diversion dikes, berms, or equivalent.</li> <li><input type="checkbox"/> Trap sediment at down gradient locations and outlets serving unstabilized areas. This may include filter fabric fences, gravel outlet protection, sediment traps, vegetated or riprap swales, vegetated strips, diversion structures, catch-basin filters, and retention/detention basins or equivalent.</li> <li><input type="checkbox"/> Stabilize all high traffic areas including all vehicle entrances and exit points. Conduct periodic sweeping of all traffic areas. Conduct inspections of BMPs.</li> <li><input type="checkbox"/> Perform preventative maintenance as needed on BMPs.</li> <li><input type="checkbox"/> Provide employee training on the proper installation and maintenance of erosion and sediment controls.</li> </ul>
<b>Waste Recycling Facilities (liquid recyclable materials)</b>	
Individual drum/container storage	<ul style="list-style-type: none"> <li><input type="checkbox"/> Ensure container/drums are in good condition. Store waste materials in materially compatible drums. Use containers that meet National Fire Protection Association (NFPA) guidelines.</li> <li><input type="checkbox"/> Put individual containers on pallets. Limit stack height of individual containers/drums. Provide straps, plastic wrap, or equivalent around stacked containers to provided stability.</li> <li><input type="checkbox"/> Label/mark drums. Segregate hazardous and flammable wastes. Comply with NFPA guidelines for segregation of flammable wastes.</li> <li><input type="checkbox"/> Provide adequate clearance to allow material movement and access by material handling equipment.</li> <li><input type="checkbox"/> Provide semipermanent or permanent cover over wastes.</li> <li><input type="checkbox"/> Establish clean up procedures, including the use of dry adsorbents, in the event of spills or leaks. Prohibit washing down of material storage areas. Disconnect or seal all floor drains from storm sewer system.</li> <li><input type="checkbox"/> Provide secondary containment, dikes, berms, containment trench, sumps, or other equivalent measure, in all storage areas. Provide proper sizing of containment with sufficient capacity for precipitation.</li> <li><input type="checkbox"/> Develop SPCC procedures for all liquid container storage areas. Ensure employees are familiar with SPCC procedures. Schedule/conduct periodic employee training.</li> </ul>
Bulk liquid storage	<ul style="list-style-type: none"> <li><input type="checkbox"/> Use welded pipe connections versus flange connections. Inspect all flange gaskets for deterioration.</li> <li><input type="checkbox"/> Apply corrosion inhibitors to exposed metal surfaces.</li> <li><input type="checkbox"/> Provide high level alarms for storage tanks.</li> <li><input type="checkbox"/> Provide redundant piping, valves, pumps, motors, as necessary, at all pumping stations. Provide manually activated shutoff valves in the event of spill. Install visible and/or audible alarms in the event of a spill.</li> </ul>



**INDUSTRIAL STORMWATER FACT SHEET SERIES**  
**Sector N: Scrap Recycling and Waste Recycling Facilities**

**Table 2. BMPs for Potential Pollutant Sources at Scrap Recycling and Waste Recycling Facilities (continued)**

Activity	BMPs
Bulk liquid storage (continued)	<input type="checkbox"/> Install manually activated drainage values, or equivalent, versus flapper-type drain values. <input type="checkbox"/> Provide adequate security against vandalism and tampering. <input type="checkbox"/> Provide secondary containment around all bulk storage tanks, including berms, dikes, surface impoundments, and/or equivalent. Ensure surfaces of secondary containment areas are adequately sealed to prevent leaks. <input type="checkbox"/> Provide stationary boxes around all return and fill stations to eliminate/minimize hose drainage and minor waste transfer spills.
Waste transfer areas	<input type="checkbox"/> Provide cover over liquid waste transfer areas. <input type="checkbox"/> Provide secondary containment or equivalent measures around all liquid waste transfer facilities. <input type="checkbox"/> Establish cleanup procedures for minor spills including the use of dry absorbents or a wet vacuum system. <input type="checkbox"/> Train employees on proper transfer procedures and spill response.
Vehicle and equipment maintenance (if applicable)	See BMPs under Scrap and Waste Recycling Facilities above
Vehicle and equipment washing (if applicable)	<input type="checkbox"/> Avoid washing parts or equipment outside. <input type="checkbox"/> Use phosphate-free biodegradable detergents. <input type="checkbox"/> Provide vehicle wash rack with dedicated sediment trap and oil/water separator. <input type="checkbox"/> Use auto shut-off valves on washing equipment. <input type="checkbox"/> Use detergent or water-based cleaning systems in place of organic solvent degreasers. <input type="checkbox"/> Designate an area for cleaning activities. <input type="checkbox"/> Contain steam cleaning washwaters or discharge under an applicable NPDES permit. <input type="checkbox"/> Ensure that washwaters drain well. <input type="checkbox"/> Inspect cleaning area regularly. <input type="checkbox"/> Install curbing, berms, or dikes around cleaning areas. <input type="checkbox"/> Train employees on proper washing procedures.
<b>Recycling Facilities</b>	
Inbound recyclable materials control	<input type="checkbox"/> Provide public education brochures to inform suppliers of recyclable materials which are acceptable and which are not. <input type="checkbox"/> Educate curbside pick-up drivers on acceptable materials. Reject unacceptable materials at the source. <input type="checkbox"/> Clearly marking public drop-off containers regarding which materials can be accepted. <input type="checkbox"/> Develop procedures for handling and disposal of non-recyclable material. <input type="checkbox"/> Implement employee training. <input type="checkbox"/> Provide totally-enclosed drop-off containers for public.
Storage	<input type="checkbox"/> Conduct processing operations indoors. Clean up residual fluids. <input type="checkbox"/> Schedule routine preventive maintenance on all processing equipment. <input type="checkbox"/> Store equivalent of the average daily volume of recyclable materials indoors. <input type="checkbox"/> Direct tipping floor washwaters to sanitary sewer system if permitted by local sanitary authority.

**INDUSTRIAL STORMWATER FACT SHEET SERIES**  
**Sector N: Scrap Recycling and Waste Recycling Facilities**

**Table 2. BMPs for Potential Pollutant Sources at Scrap Recycling and Waste Recycling Facilities (continued)**

Activity	BMPs
Storage (continued)	<input type="checkbox"/> Provide good housekeeping. <input type="checkbox"/> Disconnect all floor drains from storm sewer system. <input type="checkbox"/> Prohibit illicit discharges and illegal dumping to floor drains that are connected to the storm sewer.
Outdoor material storage	<input type="checkbox"/> Provide totally enclosed drop-off containers for the public. <input type="checkbox"/> Store only processed materials (i.e., baled plastic, aluminum, and glass cullet). <input type="checkbox"/> Provide covers over containment bins, dumpsters, and roll-off boxes. <input type="checkbox"/> Use tarpaulins or covers over bales of wastepaper. <input type="checkbox"/> Provide dikes and curbs around bales of recyclable wastepaper. <input type="checkbox"/> Divert surface water runoff away from outside material storage areas. <input type="checkbox"/> Conduct regularly scheduled sweeping of storage areas to minimize particulate buildup. <input type="checkbox"/> Provide containment pits with sumps pumps that discharge to sanitary sewer system. Prevent discharge of residual fluids to storm sewer.
Residual non-recyclable materials	<input type="checkbox"/> Store residual non-recyclable materials in covered containers for transport to a proper disposal facility. <input type="checkbox"/> Bale residual non-recyclable materials and cover with tarpaulin or equivalent.
Vehicle fueling	<input type="checkbox"/> Conduct fueling operations (including the transfer of gas/diesel fuel from tank trucks) on an impervious, contained pad, or under a roof or canopy where possible. Covering should extend beyond spill containment pad to prevent rain from entering. <input type="checkbox"/> When fueling in uncovered area, use concrete pad (not asphalt which is not chemically resistant to the fuels being handled). <input type="checkbox"/> Use drip pans where leaks or spills of gas/diesel fuel can occur and where making and breaking hose connections. <input type="checkbox"/> Use fueling hoses with check valves to prevent hose drainage after filling. <input type="checkbox"/> Clean up spills and leaks immediately. <input type="checkbox"/> Minimize/eliminate run-on onto fueling areas with diversion dikes, berms, curbing, surface grading or other equivalent measures. <input type="checkbox"/> Collect stormwater runoff and provide treatment or recycling. <input type="checkbox"/> Use dry cleanup methods for fuel area rather than hosing the fuel area down. <input type="checkbox"/> Perform preventive maintenance on storage tanks to detect potential leaks before they occur. <input type="checkbox"/> Inspect the fueling area to detect problems before they occur. <input type="checkbox"/> Train personnel on proper fueling procedures. <input type="checkbox"/> Provide curbing or posts around fuel pumps to prevent collisions during vehicle ingress and egress. <input type="checkbox"/> Discourage "topping off" of gas/diesel fuel tanks.
Illicit connection to storm sewer	<input type="checkbox"/> Plug all floor drains if it is unknown whether the connection is to storm sewer or sanitary sewer systems. Alternatively, install a sump that is pumped regularly. <input type="checkbox"/> Perform dye testing to determine if interconnections exist between sanitary water system and storm sewer system. <input type="checkbox"/> Update facility schematics to accurately reflect all plumbing connections.



**INDUSTRIAL STORMWATER FACT SHEET SERIES**  
**Sector N: Scrap Recycling and Waste Recycling Facilities**

**Table 2. BMPs for Potential Pollutant Sources at Scrap Recycling and Waste Recycling Facilities (continued)**

Activity	BMPs
Illicit connection to storm sewer (continued)	<ul style="list-style-type: none"> <li><input type="checkbox"/> Install a safeguard against vehicle washwaters and parts cleaning waters entering the storm sewer unless permitted.</li> <li><input type="checkbox"/> Maintain and inspect the integrity of all underground storage tanks, replace when necessary.</li> <li><input type="checkbox"/> Train employees on proper disposal practices for all materials.</li> </ul>
Equipment/vehicle maintenance	<p>Good Housekeeping</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Plug floor drains that are connected to the storm or sanitary sewer; if necessary, install a sump that is pumped regularly.</li> <li><input type="checkbox"/> Use drip pans, drain boards, and drying racks to direct drips back into a sink or fluid holding tank for re-use.</li> <li><input type="checkbox"/> Drain all parts of fluids prior to disposal. Oil filters can be crushed and recycled.</li> <li><input type="checkbox"/> Promptly transfer used fluids to the proper container; do not leave full drip pans or other open containers around the shop. Empty and clean drip pans and containers.</li> <li><input type="checkbox"/> Dispose of greasy rags, oil filters, air filters, batteries, spent coolant, and degreasers properly.</li> <li><input type="checkbox"/> Label and track the recycling of waste material (e.g., used oil, spent solvents, batteries).</li> <li><input type="checkbox"/> Maintain an organized inventory of materials.</li> <li><input type="checkbox"/> Eliminate or reduce the number and amount of hazardous materials and waste by substituting nonhazardous or less hazardous materials.</li> <li><input type="checkbox"/> Clean up leaks, drips, and other spills without using large amounts of water. Use absorbents for dry cleanup whenever possible.</li> <li><input type="checkbox"/> Prohibit the practice of hosing down an area where the practice would result in the discharge of pollutants to the stormwater collection system.</li> <li><input type="checkbox"/> Clean without using liquid cleaners whenever possible.</li> <li><input type="checkbox"/> Do all cleaning at a centralized station so the solvents stay in one area.</li> <li><input type="checkbox"/> If parts are dipped in liquid, remove them slowly to avoid spills.</li> <li><input type="checkbox"/> Do not pour liquid waste into floor drains, sinks, outdoor storm drain inlets, other storm drains, or sewer connections.</li> </ul> <p>Minimizing Exposure</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Perform all cleaning operations indoors or under covering when possible. Conduct the cleaning operations in an area with a concrete floor with no floor drainage other than to sanitary sewers or treatment facilities.</li> <li><input type="checkbox"/> If operations are uncovered, perform them on concrete pad that is impervious and contained.</li> <li><input type="checkbox"/> Park vehicles and equipment indoors or under a roof whenever possible and maintain proper control of oil leaks/spills.</li> <li><input type="checkbox"/> Check vehicles closely for leaks and use pans to collect fluid when leaks occur.</li> </ul> <p>Management of Runoff</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Use berms, curbs, or similar means to ensure that stormwater runoff from other parts of the facility does not flow over the maintenance area.</li> <li><input type="checkbox"/> Collect the stormwater runoff from the cleaning area and provide treatment or recycling. Discharge vehicle wash or rinse water to the sanitary sewer (if allowed by sewer authority), wastewater treatment, a land application site, or recycle on-site. <b>DO NOT</b> discharge washwater to a storm drain or surface water.</li> </ul>

INDUSTRIAL STORMWATER FACT SHEET SERIES  
**Sector N: Scrap Recycling and Waste Recycling Facilities**

**Table 2. BMPs for Potential Pollutant Sources at Scrap Recycling and Waste Recycling Facilities (continued)**

Activity	BMPs
Equipment/vehicle maintenance (continued)	Inspections and Training <input type="checkbox"/> Inspect the maintenance area regularly for proper implementation of control measures. <input type="checkbox"/> Train employees on proper waste control and disposal procedures.
Outdoor Vehicle and Equipment Storage	<input type="checkbox"/> Inspect area for leaking engines, chipping/corroding bumpers, chipping paint, galvanized metal

**What if activities and materials at my facility are not exposed to precipitation?**

The industrial stormwater program requires permit coverage for a number of specified types of industrial activities. However, when a facility is able to prevent the exposure of ALL relevant activities and materials to precipitation, it may be eligible to claim no exposure and qualify for a waiver from permit coverage.

If you are regulated under the industrial permitting program, you must either obtain permit coverage or submit a no exposure certification form, if available. Check with your permitting authority for additional information as not every permitting authority program provides no exposure exemptions.

**Where do I get more information?**

For additional information on the industrial stormwater program see [www.epa.gov/npdes/stormwater/msgp](http://www.epa.gov/npdes/stormwater/msgp).

A list of names and telephone numbers for each EPA Region or state NPDES permitting authority can be found at [www.epa.gov/npdes/stormwatercontacts](http://www.epa.gov/npdes/stormwatercontacts).

**References**

Information contained in this Fact Sheet was compiled from EPA's past and current Multi-Sector General Permits and from the following sources:

- ◆ King County, Natural Resources and Parks, Water and Land Resources Division. 2004. King County Stormwater Pollution Prevention Manual.  
<http://dnr.metrokc.gov/wlr/dss/sppm.htm>
- ◆ U.S. EPA, Office of Science and Technology. 1999. Preliminary Data Summary of Urban Stormwater Best Management Practices. EPA-821-R-99-012.  
[www.epa.gov/OST/stormwater/](http://www.epa.gov/OST/stormwater/)
- ◆ U.S. EPA, Office of Wastewater Management. *NPDES Stormwater Multi-Sector General Permit for Industrial Activities (MSGP)*.  
[www.epa.gov/npdes/stormwater/msgp](http://www.epa.gov/npdes/stormwater/msgp)
- ◆ U.S. EPA. The National Vehicle Mercury Switch Recovery Program.  
[www.epa.gov/mercury/switch.htm](http://www.epa.gov/mercury/switch.htm)
- ◆ Wisconsin Department of Natural Resources. "General Permit to Discharge under the Wisconsin Pollutant Discharge Elimination System, Recycling of Scrap and Waste Materials."  
<http://dnr.wi.gov/org/caer/cea/assistance/scrap/stormwater/scrap/permit.pdf>

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